

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al )  
                                          )  
                                          )  
v.                                      ) C.A. No. 00 - 105L  
                                          )  
THE PALESTINIAN AUTHORITY, et al )  
                                          )  
                                          )

---

**DEFENDANTS' MOTION  
TO DISMISS THE COMPLAINT**

Defendants The Palestinian Authority, the Palestine Liberation Organization (PLO), Yasser Arafat, Muhammed Dahlan, Amin Al-Hindi, Razi Jabali, Jibril Rajoub, and Tawfik Tirawi, upon the declaration of Marwan Jilani executed on June 14, 2000, and the declaration of Hasan Abdel Rahman, executed on June 14, 2000, and the complaint and all other papers and proceedings herein, respectfully move pursuant to Fed.R.Civ.P. 12(b) to dismiss the complaint against them on the grounds of lack of jurisdiction over the subject matter, lack of jurisdiction over the person, insufficiency of service of process, improper venue, failure to state a claim upon which relief can be granted, and inconvenience of the forum.

A Memorandum is filed in support of this Motion. The Declarations of Marwan Jilani and Hasan Abdel Rahman are attached hereto as Exhibits A and B.

Dated: June 15, 2000

*Deming E. Shetman*  
\_\_\_\_\_  
Deming E. Shetman (#1138)  
EDWARDS & ANGELL, LLP  
2800 Bank Boston Plaza  
Providence, Rhode Island, 02903  
(401) 274-9200  
(401) 276-6611 (FAX)

22

Ramsey Clark  
Lawrence W. Schilling  
36 East 12th Street  
New York, NY 10003  
(212) 475-3232  
(212) 979-1583 (FAX)

Attorneys for Defendants  
The Palestinian Authority, The PLO,  
Yasser Arafat, Muhammed Dahlan,  
Amin Al-Hindi, Razi Jabali, Jibril Rajoub,  
and Tawfik Tirawi

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of June, 2000, I mailed a copy of the within Defendants' Motion to Dismiss the Complaint by first class mail, postage prepaid, to David J. Strachman, Esq., Skolnik, McIntyre & Tate Esqs., Ltd., Suite 400, 321 South Main Street, Providence, RI 02903 and Nitsana Darshan-Leitner, 13 Leonardo da-Vinci Street, Tel Aviv, Israel.

Douglas D. Sherman